

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

**NOTICE OF DEFENDANTS' JOINT MOTION FOR CLARIFICATION
REGARDING *DAUBERT* HEARING ORDER 1**

PLEASE TAKE NOTICE that on April 18, 2022, or as soon as counsel may be heard, the undersigned Defense Executive Committee counsel, on behalf of all Defendants, shall move for the entry of an Order clarifying *Daubert* Order 1, [Dkt. 1958](#), with regard to the scope of testimony Drs. Stephen Lagana and Stephen Hecht are permitted to offer at trial regarding NDEA.

PLEASE TAKE FURTHER NOTICE that in support of their motion, the Defendants shall rely upon the Memorandum of Law in Support submitted herewith, any reply submissions made hereafter, and the Certification of Clem C. Trischler and appendices thereto; and

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted herewith; and

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Dated: March 18, 2022

By: /s/ Clem C. Trischler
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Defense Executive Committee

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 18, 2022, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants in this matter.

/s/ Clem C. Trischler
Clem C. Trischler